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September 14, 1999 3:22 PM SEP 17 A9:55

Food and Drug Administration
Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852

To Whom It May Concern:

I am writing in response to your request for public comments regarding the reduction of egg-borne diseases. Specifically, please reference docket nos:

- 98N-1230;
- 96P-0418; and
- 97P-0197.

The FDA must do more than simply put bacteria warning labels on egg cartons and regulate egg refrigeration temperatures.

To help combat egg-borne diseases, the FDA should also prohibit the practice of forced molting of hens.

Each year the US egg industry force molts--intentionally starves for up to 14 days--millions of hens to manipulate egg production. Forced molting promotes disease by destroying the starving hens' immune systems.

The US Dept of Agriculture's Food Safety & Inspection Service (FSIS) states: "FSIS recognizes that public health concerns are raised by highly stressful forced molting practices. For example, extended starvation and water deprivation practices lead to increased shedding of Salmonella enteritidis by laying hens subjected to these practices."

96P-0418

C 626

I believe the practice of forced molting is a primary cause of infectious diseases in hens, eggs, and ultimately, compromises the health of consumers.

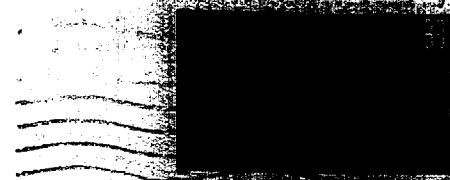
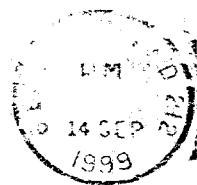
The FDA has jurisdiction to ban farm practices that injure human health and was petitioned to ban forced molting in April 1998. This petition should be granted without further delay.

Sincerely,



Paul V. Sapia

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HEALTH AND HUMAN SERVICES
FOOD AND DRUG ADMINISTRATION
CROSS REFERENCE SHEET

Docket Number/Item Code: 98N-1230/C626

See Docket Number/Item Code: 97P-0197/C627
96P-0418/C626